## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

State Chapter 11

W. R. GRACE & CO., et al.,

Debtors.

Debtors.

State No. 01-01139 (JKF)

Hearing Deptors.

State No. 01-01139 (JKF)

Stat

SUMMARY OF APPLICATION OF SEITZ, VAN OGTROP & GREEN, P.A. FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF EXPENSES AS LOCAL COUNSEL TO THE LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS AND HOLDERS OF DEMANDS FOR THE FOURTH INTERIM PERIOD FROM APRIL 1, 2011 THROUGH APRIL 30, 2011

Name of Applicant: Seitz, Van Ogtrop & Green, P.A.

R. Karl Hill, Esq.

Authorized to Provide Services To: Hon. Alexander M. Sanders, Jr.,

Legal Representative for Future Asbestos-Related Property Damage Claimants and

Holders of Demands

Date of Retention: September 29, 2008 (nunc pro tunc)

Period for Which Compensation

and Reimbursement is Sought: April 1, 2011 through April 30, 2011

Amount of Fees Sought as Actual

Reasonable and Necessary: \$2,628.00 [80% of \$3,285.00]

Amount of Expenses Sought as

Actual, Reasonable and Necessary: \$0

This is a(n):  $\square$  Monthly  $\square$  Interim  $\square$  Final Application

### **PRIOR APPLICATIONS**

Date Filed	Period Covered	Requested Fees <sup>1</sup>	Requested Expenses	Status of Fees	Status of Expenses
11-13-2009	9-29-08 to 2-28-09	\$1,632.00	\$0.00	Paid	Paid
3-25-2011	3-1-09 to 2-28-11	\$1,838.40	\$4.80	Paid	Paid
5-3-2011	3-1-11 to 3-31-2011	\$816.00	\$0.00	CNO Filed	CNO Filed

R. Karl Hill is the only attorney providing services in this Fee Application period. Mr. Hill has practiced law for over 20 years, and his billing rate is \$300.00 per hour. In this application period, Mr. Hill billed 10.95 hours, for a total amount billed of \$3,285.00 of which 80% is currently sought, in the amount of \$2,628.00.

As stated above, this is the Fourth application for monthly fees and expenses. The time for preparation of this Application is approximately .4 hours, for which \$260.00 will be requested in a future application by lead counsel for the PD FCR.

### COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	10.95	\$3,285.00
TOTAL	10.95	\$3,285.00

### EXPENSE SUMMARY

Description	Expense
	\$0
TOTAL	\$0

Detail of the fees and expenses billed is attached hereto as Exhibit A.

<sup>&</sup>lt;sup>1</sup> At 80% of the total incurred.

### CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, a professional person seeking approval of this Monthly Fee Application, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,

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Alan B. Rich, Esq.
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COUNSEL TO HON. ALEXANDER
M. SANDERS, JR., LEGAL
REPRESENTATIVE FOR FUTURE ASBESTOSRELATED PROPERTY DAMAGE CLAIMANTS
AND HOLDERS OF DEMANDS

### CERTIFICATE OF SERVICE

I certify that on the 3<sup>rd</sup> day of June, 2011, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.

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MBKIL

# **EXHIBIT A**

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### SEITZ, VAN OGTROP & GREEN, P.A.

222 Delaware Avenue, Suite 1500 P.O. Box 68

Wilmington, Delaware 19899 (302) 888-0600 Fax: (302) 888-0606

Alexander M. Sanders, Jr. c/o Alan B. Rich, Esquire One Main Place, Suite 1910 1201 Main Street, LB 201 Dallas TX 75202-3909

Account No: Statement No:

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Sanders In Re: W. R. Grace

### For Services Rendered Through 04/30/2011

### **Fees**

04/04/2011				Hours		
RKH	Emails with A. Rich re: filing of notice of appearance ( and file notice of appearance and certificate of service	• .		1.30		
04/05/2011 RKH	Review appellate docket.			1.00		
04/06/2011						
RKH	Anderson issues on appeal/designation of record (.3); issues on appeal and deposition (.3); joint designation Debtors et al., (1.0).			1.60		
04/21/2011						
RKH	Motion of bank lenders to exceed page limitation (.35); by Libby claimants (.20).	motion to seal file		0.55		
04/26/2011						
RKH	Various tasks associated with adding Mr. Rich to notice (1.0); Supplemental Appendix filed by Maryland Casua BNSF Railway (.30); brief of Gov't employees (.55); brief of Montana (.5) brief of Anderson Memorial Hospi Libby claimants (.5); brief of AXA Belgium (.5); brief of of unsecured creditors (.5).	lty (.5); brief of ef of Lange (.5); ital (.5) brief of		6.00		
04/28/2011						
RKH	Notice from Court on appellees brief due date (May 28 vice notice for Rich (.1); order regarding excess pages			0.50		
	For Current Services Rendered			10.95	3,285.00	
Summary of Fees						
Timekeeper		<u>Hours</u>	Rate		Total	
R. Karl Hill		10.95	\$300.00		\$3,285.00	

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Alexander M.	Sanders, Jr.				Page: 2 May 25, 2011
				Account No:	40324-001M
Sanders In Re	: W. R. Grace			Statement No:	26051

ers In Re: W. R. Grace	Statement No: 26051	
Total Current Work	3,285.00	
Previous Balance	\$3,729.80	
Balance Due	\$7,014.80	
Please Remit	\$7,014.80	